

### **REMARKS**

Claims 1-4 and 6-14 are pending in the application and stand rejected. Claim 1 has been amended herein. The amendment is supported by the application as originally filed and presents no new matter.

#### **Claim Rejections under 35 USC §102**

Claim 1 continues to stand rejected under USC §102(b) in view of U.S.2002/0040397 to Moon Jeong Choi. Applicants continue to respectfully disagree. Nonetheless, Applicants have amended claim 1 to recite that “at least one of the network devices in the cluster is designated as the cluster management device and configured with a public IP address; the network devices in the cluster are configured and updated with private IP addresses and routes by the cluster management device.” [emphasis added]

Applicants incorporate the arguments presented in their previous response by reference thereto, and reply to the Examiner’s new assertions as follows.

The cluster management device as defined in claim 1 is at least one of the network devices in the cluster, and any one of the network devices in the cluster can be designated as a cluster management device. The designated cluster management device has identical capability with the other network devices in the cluster before it is designated as the cluster management device. The designated cluster management device configures and updates other network devices with private IP addresses and routes the network devices. Thereby, a network management device manages the network devices in the cluster via the cluster management device.

Choi, on the other hand, discloses a home network including a DHCP server, a lookup server and local devices, etc. The DHCP server provides the devices within the home network 1 with unique identifiers, i.e., IP addresses. However, the DHCP server of Choi is a dedicated server adapted to allocate IP addresses, and is different from other devices in the home network. Conversely, the other devices in the home network can not be set up to operate as the DHCP server. For example, a local device in Choi’s home network (such as, for instance, a refrigerator)

cannot be set up to operate as a DHCP server to allocate IP addresses. Furthermore, the DHCP server of Choi is only adapted to allocate IP addresses to the devices in the home network, but can not route the devices.

Applicants thus respectfully insist that the cluster management device and network management device of present application are quite different from the DHCP server and lookup server of Choi, and request the Examiner to kindly reconsider and withdraw this rejection.

Claim Rejections under 35 USC §103

Claims 2-13 stand rejected under 35 USC §103 as unpatentable over Choi in view of, variously, Dinker, Poston, and the general knowledge in the art. Applicants respectfully disagree but do not discuss these claims individually because these claims all depend, directly or indirectly, from claim 1. Applicants thus submit that claims 2-13 are therefore patentable at least in view of their dependencies from claim 1.

~ ~ ~

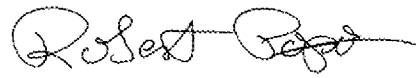
Regarding the prior art made of record by the Examiner but not relied upon, Applicants believe that this art does not render the pending claims unpatentable.

In view of the above, Applicants submit that the application is now in condition for allowance and respectfully urge the Examiner to pass this case to issue.

\* \* \*

The Commissioner is authorized to charge any additional fees which may be required or credit overpayment to deposit account no. 12-0415. In particular, if this response is not timely filed, the Commissioner is authorized to treat this response as including a petition to extend the time period pursuant to 37 CFR 1.136(a) requesting an extension of time of the number of months necessary to make this response timely filed and the petition fee due in connection therewith may be charged to deposit account no. 12-0415.

Respectfully submitted,



---

Robert Popa  
Attorney for Applicants  
Reg. No. 43,010  
LADAS & PARRY  
5670 Wilshire Boulevard, Suite 2100  
Los Angeles, California 90036  
(323) 934-2300 voice  
(323) 934-0202 facsimile  
rpopa@la.ladas.com